DOW CHEMICAL U.S.A.

January 18, 1983

Executive Director
Texas Department of Water Resources
P. O. Box 13087
Capitol Station
Austin, TX 78711

TDWR SOLIC WASTE REGISTRATION #30106

Dear Sir:

Attached is a closure plan for a hazardous waste storage tank that we have been operating under Chapter 22 of the Industrial Solid Waste Rules. The tank is included in our EPA Part A, our Texas Part A, and is listed on our Registration as Facility Number 12.

We would appreciate your prompt attention to this matter so that we can proceed to clean this tank which has been taken out of service.

Very truly yours,

Larry Bone

Larry Bone
Environmental Services

wf

Attachment

cc Dist 7
1/24/83 mm

CLOSURE PLAN FOR D-218

1. The tank will be emptied of liquid and the liquid will be burned in the Texas Division thermal oxidizer.

2. The tank will be rinsed with carbon tetrachloride. The rinse will be 4,000 gallons of carbon tetrachloride. The tank will be emptied of liquid and the liquid burned in the thermal oxidizer.

3. The tank will be filled with 8% caustic solution (cell effluent). The tank contents will then be pumped back into our process at a controlled rate for pH control of feed to a scrubber tower. The scrubber tower effluent is in turn used as a process raw material. Any remaining RCl's will be contained in process purification towers, collected in process dumpsters and burned in the Texas Division thermal oxidizer.

4. After washing with the caustic solution, the tank will no longer be hazardous.

KLJ/jla
1/14/83

TDWR REGISTRATION

1. Plant refuse, general miscellaneous	II	279760	On-Site Landfill, Incineration
2. Miscellaneous plant residues	II	249860	On-Site Landfill
3. Non-chlorinated organic sludges and semi-solids	I	15	On-Site Incineration Reprocessing Storage Landfill Off-Site Incineration Reprocessing
4. Polychlorinated hydrocarbon sludges	I	150140	On-Site Incineration Reprocessing Storage Landfill Off-Site Incineration Landfill
5. Solid plastics	II	280270	On-Site Incineration Landfill
6. Oils and solvents (with organic residues)	I	111400	On-Site Incineration Reprocessing Storage Off-Site Incineration
7. Hydrocarbons, chlorinated	I	110570	On-Site Incineration Reprocessing Storage Off-Site Incineration Landfill
8. Magnesium cell sludge	II	240720	On-Site Landfill

9. Insulation containing asbestos	I	179390	On-Site Landfill
10. Heavy metals bearing sludge	I	140080	On-Site Landfill
11. Metals, base scrap	III	370350	Off-Site Reprocessing On-Site Landfill
12. Organic solids/semi-solids	II	251580	On-Site Incineration

12-4-81

We have identified a relatively extensive list of commercial chemical products which are potential sources of wastes. The waste numbers corresponding to each of these wastes were submitted on our original hazardous waste notification because we might need to dispose of some of the material as either off-spec or spill residue. To avoid cluttering the hazardous waste summary form with all of these numbers, we have prepared the following list which indicates which TDWR codes we would use if we needed to dispose of wastes from these commercial chemical products.

TDWR WCC - _____ TDWR seq. - 3

U019, U070, U [illegible], U159, U188, U221, U223, P003, P030, P161

TDWR WCC - 150140 TDWR seq. - 4

U041, U043, U045, U076, U077, U078, U079, U080, U083, U084, U226, U227, U228, P090

TDWR WCC - 111400 TDWR seq. - 6

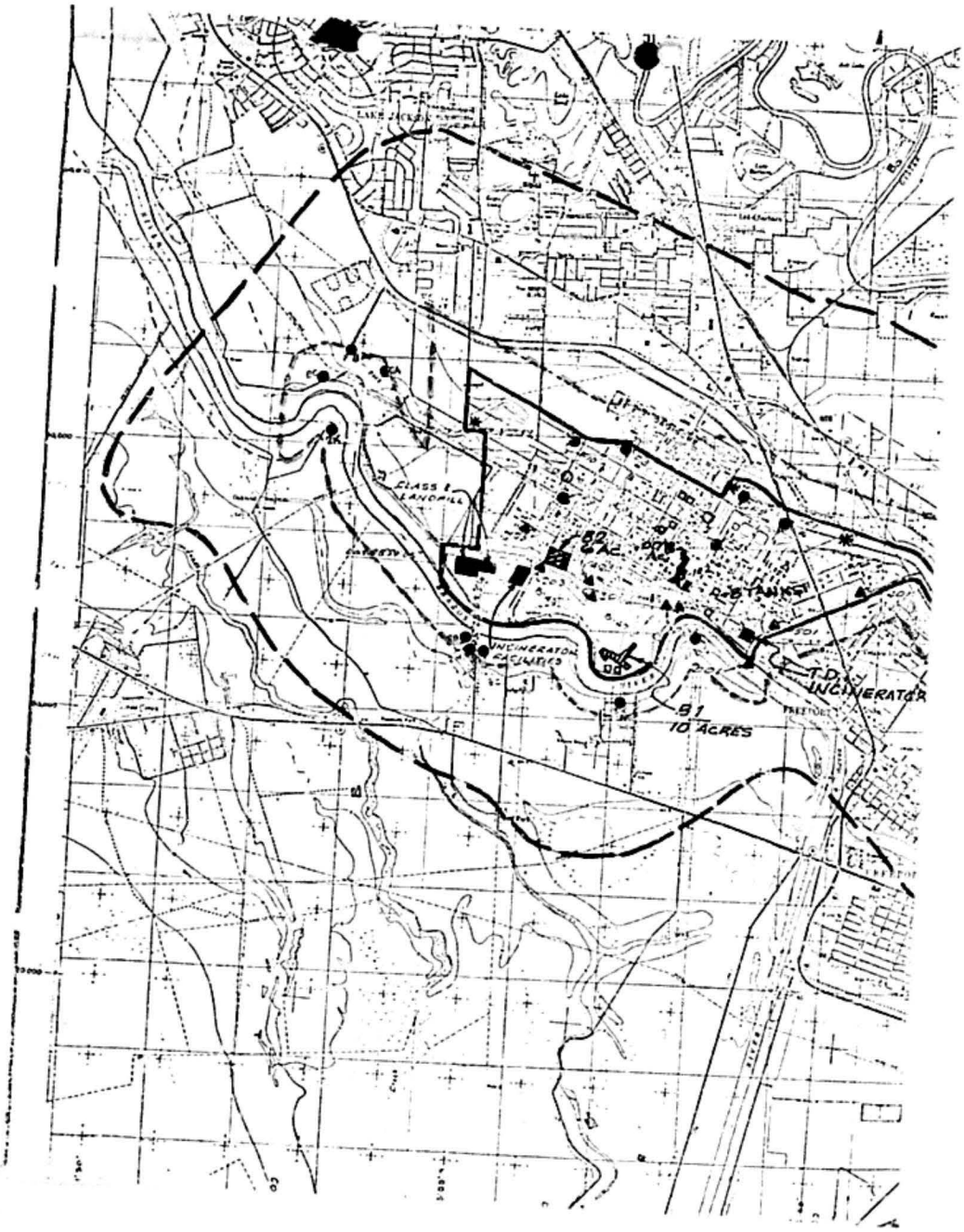
U002, U008, U012, U019, U055, U108, U115, U159, U188, U191, U196, U220, U221, U223, P003, P005, P020, P022, P030

TDWR WCC - 110570 TDWR seq. - 7

U041, U043, U044, U045, U070, U076, U077, U078, U079, U080, U083, U084, U121, U210, U211, U226, U227, U228

TDWR WCC - 140080 TDWR seq. - 10

P022, P030, P120



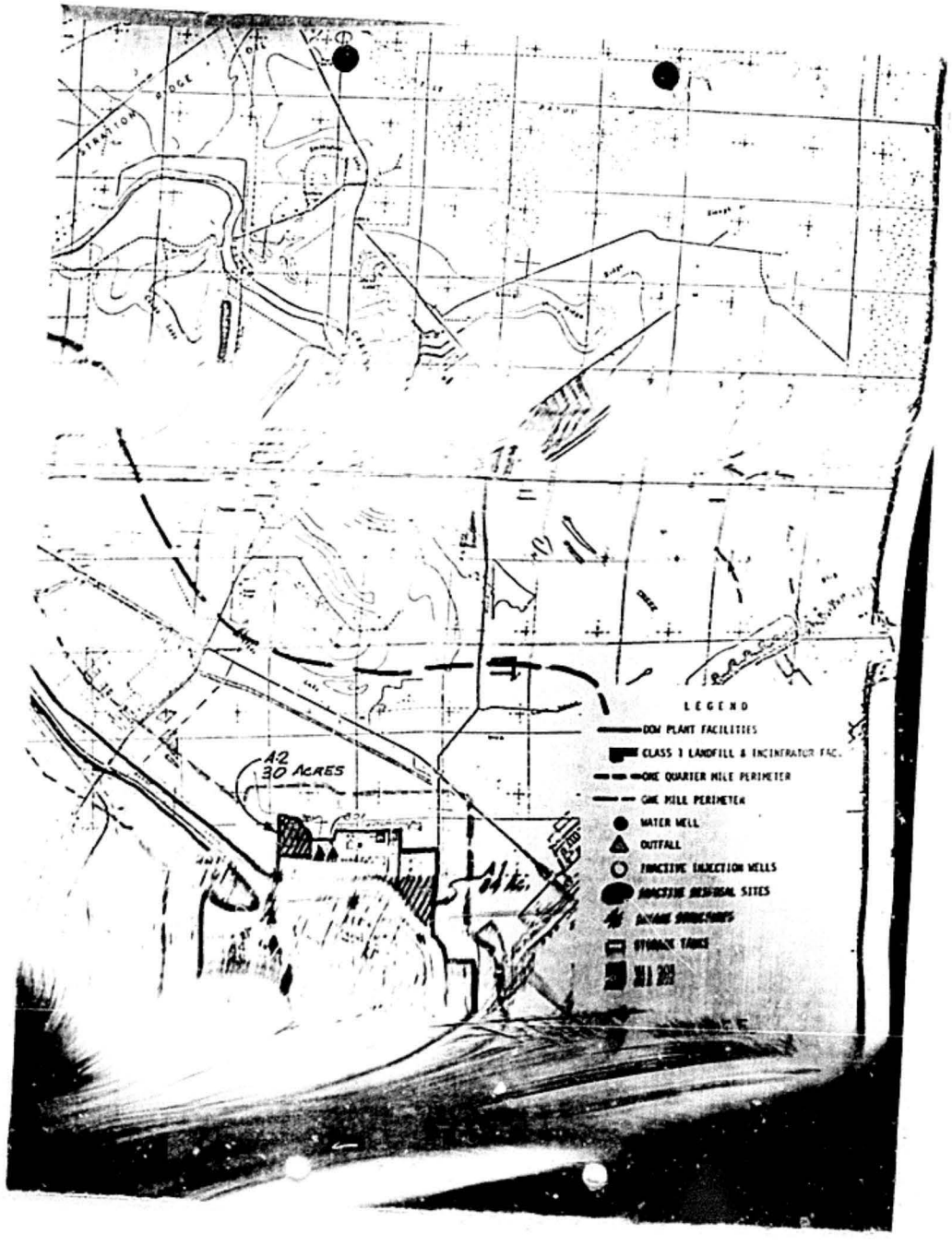


Table III-4 Hazardous Waste Facility Components List

Facility Component Name	TDWR Seq. No.	Status: Inactive	Active	Proposed	Design Capacity: (cu yds)	(gal)	(lbs)	Number of Years Utilized	Date in Service
MW-69		X					26,000,000	3	1970-73
Physical Description: Plant "3" Disposal Well #1 is located in the B-1700 block and was permitted 8/69 to dispose of aqueous solution of inorganic and organic wastes from the glycerine plant. Wastes were injected between 5778'-5864'. The well was plugged 3/77 with 2535 cubic feet of cement.									
71		X					3,800,000	4	1971-75
Physical Description: Plant "B" Disposal Well #2, located in the B-620 Block, permitted in 1971 to dispose of aqueous solutions of inorganic and organic wastes from the epoxy plant. Wastes were injected between 6200'-6400'. The well was plugged 11/79.									
MW-81		X					12,000,000	3	1971-74
Physical Description: Plant "A" Disposal Well #1, located in the A-38 Block, permitted in 1971 to dispose of aqueous solutions of inorganic and organic wastes from the glycol A and ethylene dichloride plants. Wastes were injected between 6295'-6356'. The well was plugged 12/79.									
B-4 Incinerator Area			X	X			2.0 million/Mo.		
Physical Description: Consists of 2 scrubberburners to burn chlorinated hydrocarbons and two incinerators used to burn oils and solvents, storage tanks, a spill cleanup facility and drum washing unit. Two additional solids incinerators are being installed to burn paper, wood, trash, plastic foams, polywax, non-chlorinated resins, ion-exchange resins, latex solids, etc. to be completed in 1981. Additional liquids incinerator is being built to replace existing burners and will incinerate waste oils, non-chlorinated solvents, amines, organic acids and other liquid burnable wastes. The liquid incinerator will also be completed in 1981.									
Physical Description:									
B-5 Landfill			X				880,000,000*	0	1980
Physical Description: A 10-acre landfill for the disposal of hazardous wastes according to RCRA defintion. This landfill will begin accepting wastes August, 1980.									

*2000 acre-ft

Table [illegible] Hazardous Waste Facility Components List

Revised Replaced 9-10-82 TX 1066

Facility Component Type	TDEH Seq. No.	Status: Inactive	Active	Proposed	Design Capacity: (cu yds)	(gal)	(lbs)	Number of Years Utilized	Date in Service
A-100 Block Landfill		X					1,000,000	5	1945-50
Brief Description: First landfill in the Texas Division; Caustic wastes and other process wastes were disposed of at this site, along with lumber, trash and drummed materials.									
A-41 Disposal Area (A-41 Block)		X					1,253,300,000	20	1953-73
Brief Description: A 34 acre landfill used to bury magnesium sludge, general trash and lumber, R-cake from the mag process, solids from riverwater treating, and miscellaneous organics. Radioactive wastes were also disposed of in this area under license.									
A-2 Disposal Are (6 pits)		X					56,010,000	6	1970-76
Brief Description: The A-2 site (30 acres) was a series of six earthen pits (150' x 200' x 10') used to impound chlorinated hydrocarbons. In 1975 Dow began removing the chlorinated hydrocarbons and using them as feedstock for our Thermal Oxidizer to produce HCl for the production of magnesium.									
B-1 Disposal Area (12 pits)		X					164,200,000	8	1973-80
Brief Description: In 1975, we began removing chlorinated hydrocarbons and using them as feedstock for our Thermal Oxidizer to produce HCl for the production of magnesium. The top water from the pits was returned to the waste treatment plant. The emptied ponds are filled with construction rubble and covered with clay. A 10-acre tract was used as a landfill to dispose of drums containing resins, waxes, and chlorinated materials.									
Site B-2		X					220,000,000	29	1944-73
Brief Description: Two 3 acre lagoons which impound approximately 22 million gallons of styrene tars. Dow anticipates recovering these tars at some future date.									
A-27 Block		X					200,000		1948-52
Brief Description: Area used between 1948 and 1952 for construction debris, magnesium sludge and other process wastes.									